

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

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Case No. 3:21-cv-00259
[Lead Case]

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE STATE OF TEXAS and JOHN SCOTT, in
his official capacity as Texas Secretary of
State,

Defendants.

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Case No. 3:21-cv-00299
[Consolidated Case]

**STATE DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS**

The State of Texas and John Scott, in his official capacity as Texas Secretary of State, (“State Defendants”) file this unopposed motion requesting an extension of time to file a reply in support of their Motion to Dismiss the United States’ Complaint or, in the Alternative, for a More Definite Statement (ECF 111) and show the Court the following:

1. On December 6, 2021, the United States of America filed its Complaint in consolidated Case No. 3:21-cv-299, W.D. Tex. (ECF 1).
2. On December 27, 2021, State Defendants filed their Motion to Dismiss the United States’ Complaint or, in the Alternative, for a More Definite Statement (ECF 111).

3. The United States filed its Opposition to Texas's Motion to Dismiss (ECF 161) on January 24, 2022.
4. Pursuant to Local Rule 7(e)(2), State Defendants' reply in support of their Motion to Dismiss is due January 31, 2022.
5. Counsel for State Defendants are involved in a four-day preliminary injunction hearing in *Brooks, et al. v. Abbott, et al.*; Case No. 1:21-cv-991 (W.D. Tex.), that began on January 25, 2022.
6. State Defendants are seeking an extension up to and including February 14, 2022, for their reply in support of their Motion to Dismiss.
7. On January 25, 2022, the undersigned conferred with counsel for Plaintiff concerning this request, who represented that Plaintiff is unopposed to the request.
8. State Defendants respectfully request that the Court grant an extension of the current deadline to reply in support of their motion up to and including February 14, 2022.
9. This motion is not presented for purposes of delay and will not prejudice any party to this litigation.

Date: January 26, 2021

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

Respectfully submitted.

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/s/ Jeffrey M. White
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Counsel for State Defendants

CERTIFICATE OF CONFERENCE

I hereby certify that on January 25, 2022, I conferred with Daniel Freeman, counsel for Plaintiff, via telephone regarding this Motion. Plaintiff is unopposed.

/s/ Jeffrey M. White
JEFFREY M. WHITE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been sent by electronic notification through ECF by the United States District Court, Western District of Texas, El Paso Division, on January 26, 2022, to counsel of record.

/s/ Jeffrey M. White
JEFFREY M. WHITE